

REMARKS

Claims 13-14 stand rejected under 35 U.S.C. 102(b) as being anticipated by Satou (U.S. Patent No. 5,930,607). In response, Applicants amended the claims to clarify that the electrostatic protection element portion has a plurality of metal layers formed on the same layer, and respectfully traverse.

The Office Action cites Satou as teaching in FIGs. 9, 10, and 19 an electrostatic protection element portion 140A, 140B that comprises a plurality of metal layers 900 and 930, as viewed from FIG. 19. However, the electrode 900 and electrode layer 930b are not formed on the same layer, as now recited in amended claims 13 and 14.

In contrast, as shown in FIG. 23b of the present application, for example, metal layers 200 are formed on an insulating layer 52. Contact holes 98 are formed in a semiconductor layer 54, and an ITO layer 43 connects the metal layers 200. Since Satou fails to disclose or suggest a plurality of metal layers formed on the same layer, as now recited in amended claims 13 and 14, withdrawal of the §102 rejection is respectfully requested.

Claim 15 stands rejected under 35 U.S.C. 102(b) as being anticipated by Holmberg et al. (U.S. Patent No. 5,668,032), or in the alternative under Kawai et al. (U.S. Patent No. 6,411,348). In response, Applicants amended independent claim 15 to incorporate the subject matter of claim 16. Accordingly, the rejection is considered moot.

Claims 15-16 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Satou, and further in view of Shiraki et al. (U.S. Patent No. 5,926,234). In response,

Applicants traverse the rejection for the reasons recited above with respect to the rejection of independent claims 13 and 14.

More specifically, amended claim 15 now calls for an electrostatic protection element portion that includes a plurality of metal layers formed on the same layer as the first common wiring or the second common wiring. Since the metal layers 900 and 930b of Satou are not formed on the same layer, withdrawal of the §103 rejection of claims 15-16 is respectfully requested.

New claim 17 is added for consideration and defines the electrostatic protection element as having a multi-layer structured metal layer in which a top layer is partially removed and an under layer is exposed. Applicants earnestly solicit allowance of new claim 17.

For all of the foregoing reasons, Applicants submit that this Application is in condition for allowance, which is respectfully requested. The Examiner is invited to contact the undersigned attorney if an interview would expedite prosecution.

Respectfully submitted,

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